

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND FACSIMILE

December 15, 2014

The Honorable George B. Daniels
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street, Room 630
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Daniels:

The Plaintiffs' Executive Committees write to respectfully request a brief further extension of the deadline for their opposition to the Renewed Motion to Dismiss of the Kingdom of Saudi Arabia and Saudi High Commission for Bosnia & Herzegovina (SHC), from December 30, 2014 to January 9, 2015. Saudi Arabia and the Saudi High Commission will not oppose plaintiffs' request for a further extension.

As Your Honor is aware, plaintiffs submitted transcripts of testimony provided by Zacarias Moussaoui to the Department of Justice in late October, seeking formal confirmation that the DOJ did not object to the public filing of that testimony as part of plaintiffs' Opposition to Defendants' Renewed Motion to Dismiss. In response to a request for an update on the review process, the DOJ advised plaintiffs on December 5th that it expected to communicate its decision to plaintiffs' counsel early in the following week. On December 9th, the DOJ reiterated that it expected to communicate a decision that same week. However, on Friday, December 12th, the DOJ advised that the review remained ongoing and would extend at least into this week.

Because only a limited subset of plaintiffs' counsel have received clearances to access the testimony, many of the attorneys on plaintiffs' side who are working on plaintiffs' Opposition do not themselves have access to the testimony while the DOJ review remains ongoing. Further, a number of plaintiffs' counsel are scheduled to begin vacation holidays at the end of this week.

Given that the DOJ has not yet completed its review and communicated its position concerning the Moussaoui testimony to plaintiffs, and in light of the impending holidays,

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plaintiffs respectfully request that the deadline for filing their Opposition to the Defendants' Renewed Motion to Dismiss be extended from December 30, 2014 to January 9, 2015.

This brief extension will not materially delay proceedings on the Renewed Motion to Dismiss, and is needed to allow sufficient time for plaintiffs to process the DOJ decision and finalize their submissions in light of same. The brief extension will also provide a window for any follow up discussions with the DOJ concerning its decision, as may be necessary in order for plaintiffs to finalize their opposition papers.

Plaintiffs further propose that the deadline for Defendants' Opposition to Plaintiffs' Motion to Amend their Pleadings be correspondingly extended to January 9, 2015.

Finally, plaintiffs respectfully request that the Court endorse a five (5) page extension of the page limitation for those opposition briefs.

A proposed form of Order is enclosed herewith for the Court's consideration.

Respectfully submitted,



Sean P. Carter

THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

SPC/bdw

cc: The Honorable Frank Maas (via Overnight UPS Mail)
All Counsel of Record (via ECF and Email)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re Terrorist Attacks on September 11, 2001
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ORDER

03 MDL 1570 (GBD)(FM)

Any opposition to the Renewed Motion to Dismiss of the Kingdom of Saudi Arabia and Saudi High Commission for Bosnia & Herzegovina (SHC) is due on or before January 9, 2015.

Any opposition to Plaintiffs' Motion to Amend is due on or before January 9, 2015.

The parties' request for an extension of the page limitation is GRANTED. Any opposition is not to exceed 30 pages in length.

Dated: December __, 2014
New York, New York

SO ORDERED:

GEORGE B. DANIELS
United States District Judge